

EXHIBIT 11

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

JOANN LEDOUX, a single woman,

Plaintiff,

v.

OUTLIERS, INC., a Delaware Corporation;
DANIEL FREED, individually; MATT
RUBIN, individually; BRAND
NUTRACEUTICALS, INC. (d/b/a BRAND
NUTRA), a New York Corporation; BRAND
PACKAGING GROUP, a New York
Corporation; JOHN/JANE DOES 1–5,

Defendants.

Case No. 3:24-cv-05808-TMC


ORDER ON DISCOVERY HEARING

The Court held a discovery hearing on April 3, 2025. Dkt. 77. For the reasons stated on the record at the hearing, the Court ORDERS as follows: The Court will GRANT a partial stay of discovery. The discovery that will be allowed will be limited to: 1) the existence of the arbitration agreement and its alleged formation; 2) the personal jurisdiction arguments advanced by the individual Thesis Defendants; and 3) producing copies of documents, electronically stored information, and tangible things identified in the parties' initial disclosures. Otherwise, discovery is STAYED pending resolution of the Defendants' dispositive motions pending at Dkt. 57, 58, 62.

1 The Parties are instructed to meet and confer to determine (1) an adjusted briefing
2 schedule for the motions pending at Dkt. 57 and 58 and (2) the written discovery and depositions
3 that fall under the scope of the limited discovery outlined above. To the extent the parties can
4 reach an agreement, they shall file a stipulated motion and proposed order with the Court. A
5 stipulated motion with an adjusted briefing schedule should be filed no later than April 8, 2025.
6 To the extent the parties cannot reach agreement, they shall request another discovery hearing
7 with the Court and file a joint statement outlining the specific areas of disagreement.

8 Based on the stay of discovery, the Court also QUASHES the pending subpoena to
9 Recoop LLC. The parties are further directed to meet and confer on a stipulated protective order
10 governing the use of the “_Standup” document already possessed by Plaintiff. The Court has
11 directed Plaintiff to keep that document confidential until a protective order is entered.

12 Dated this 3rd day of April, 2025.

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15 Tiffany M. Cartwright
16 United States District Judge
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